

Site: Moline Creek  
ID #: MOD 980631162  
EPA #: 11.6  
Owner: Certainite d Corp  
NJD

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Certainiteed Corporation  
c/o The Corporation Trust Company,  
Registered Agent  
Corporation Trust Center  
1209 Orange Street  
Dover, Delaware 19801

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Superfund

0400

Dear Sir or Madam:

INFORMATION REQUEST

The United States Environmental Protection Agency, Region VII, ("EPA") is currently seeking information pertaining to the presence of hazardous substances, specifically asbestos, on or adjacent to the former Certainiteed Corporation facility located at 600 St. Cyr Road in St. Louis, Missouri (the "Site").

Pursuant to the authority of Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604, as amended ("CERCLA"), you are hereby requested to respond to the Information Request set forth in Attachment A hereto.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully within thirty (30) days of receipt of this letter, or your failure to adequately justify such failure to respond, may result in enforcement action by EPA pursuant to Section 104(e) of CERCLA. This statute permits EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000.00) for each day of continued non-compliance. The provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties pursuant to 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Please submit your response to this Information Request to:

David A. Hoefer, Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. If you have any questions relating to this Information Request, you may consult with EPA prior to the time specified above. Please direct questions to Mr. Hoefer by calling (913) 551-7503.

Thank you for your cooperation in this matter.

Sincerely,

Robert L. Morby  
Chief, Superfund Branch

## ATTACHMENT A

### **INFORMATION REQUEST**

#### INSTRUCTIONS

1. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.

2. The information requested herein must be provided even though the Respondent may contend that it possibly includes confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b) by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above-cited statute and regulation carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

#### DEFINITIONS

The following definitions shall apply to the following words as they appear in this Attachment A:

1. The term "you" or "Respondent" shall mean Certainteed Corporation and Certainteed Corporation's officers, employees, agents, subsidiaries, predecessors, successors, and assigns.

2. The term "Site" shall mean the former Certainteed Corporation facility located at 600 St. Cyr Road in St. Louis, Missouri.

3. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

4. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

5. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or 40 C.F.R. Part 300, in which case the statutory or regulatory definitions shall apply.

#### QUESTIONS

1. Identify all persons consulted, and all documents reviewed in the preparation of responses to this Information Request.

2. Identify all persons, including Respondent's employees, who have knowledge, information or documents pertaining to the generation, use, treatment, storage, disposal or other handling of hazardous substances at the Site.

3. Describe the nature of your activities or business at the Site, particularly with respect to your processing, storing, treating, disposing, or otherwise handling of asbestos or asbestos containing material ("ACM").

4. Identify the time periods during which you operated and/or owned the Site.

5. Did you acquire any portion of the Site after the disposal or placement of asbestos or ACM on, or at the Site? Describe all of the facts on which you base the answer to this question.

6. Identify all solid waste units (e.g. waste piles and landfills) located at the Site during the period that you owned/operated the Site. For each unit identified, provide the following information:

- a. The type of unit, and the dimensions of the unit;
- b. The dates that the unit was in use;
- c. The past usage of the unit;
- d. The quantity and types of materials located in the unit;
- e. The construction of the unit;
- f. How such unit was closed and what actions were taken to prevent or address potential or actual releases of asbestos or ACM from the unit; and
- g. If available, provide a map showing the unit's boundaries and the location of all known solid waste units.

7. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of asbestos or ACM at or from the Site.

8. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

9. For every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.